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January 5, 2024

Re: United States v. Wang, et al., 23 Cr. 302 (PGG)

By ECF

The Honorable Paul G.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Judge Gardephe:

I am counsel to Qingzhou Wang in the above captioned case. I am writing to request an adjournment of the status hearing scheduled for January 9, 2024 for 60 days to March 11, 2024. I have conferred with AUSAs Alexander Li and Kevin Sullivan and they do not object to this request. Co-defendant's counsel, Marlon Kirton does not join in this request.

As the court is aware, there is a considerable volume of discovery in three different languages which has to be transcribed and translated into languages understandable by mono-lingual (English) defense counsel and our mono-lingual (Mandarin) client. We have diligently pursued that end and have spent several days at MDC with a Mandarin speaking attorney with our client, but that process is slow and his ability to independently review and understand the transcripts and our legal process is limited. Moreover, as you know, our client's ability to review transcripts at MDC without the assistance of counsel is limited. Given the significance of the exposure in this matter, the time and effort necessary to assure that our client is fully informed and defense counsel is fully able to advocate on his behalf is time well spent.

For this purpose, on behalf of Mr. Wang, Counsel consents to the exclusion of speedy trial time between January 9, 2024 and March 11, 2024.

Respectfully,



Daniel N. Arshack
Daniel Olmos
Ting Wu
Counsel to Qingzhou Wang

CC: AUSA Alexander Nuo Li (by ECF)
AUSA Kevin T. Sullivan (by ECF)
Marlon Kirton, Esq. (by ECF)